228745

BEFORE THE SURFACE TRANSPORTATION BOARD

Office of Proceedings

Part of Public Record

Docket No. Ex Parte 705

COMPETITION IN THE RAILROAD INDUSTRY

REPLY TO THE MOTIONS OF THE ASSOCIATION OF AMERICAN RAILROADS AND THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION TO EXTEND PROCEDURAL SCHEDULE

The American Chemistry Council, American Forest and Paper Association, Chlorine Institute, The Fertilizer Institute, National Grain and Feed Association, and National Industrial Transportation League, (collectively "Interested Parties"), hereby reply to the motions filed by the Association of American Railroads ("AAR") and the American Short Line and Regional Railroad Association ("ASLRRA") on January 25 and 26, 2011, respectively, to extend the procedural schedule in this docket. The Interested Parties do not oppose the extension requested by the AAR, but do object to the longer extension requested by the ASLRRA.

This is a very important proceeding concerning issues of significant interest to the Interested Parties and the shipping community as a whole. It is in the interest of shippers, the rail industry, and the Board to develop a thorough and well-considered record surrounding these issues. Because the Board's proposed date for submitting initial comments, on February 18, 2011, barely provides 30 days, the Interested Parties agree that some additional time is warranted due to the number and complexity of the issues posed by the Board's Notice.

However, this also is a proceeding that is long overdue from the perspective of the Interested Parties. It is very important that the Board address these issues in a prompt and timely fashion. While the Interested Parties believe that the AAR's proposed extension strikes a

balance between the need for a complete record with expeditious handling, the ASLRRA request would result in undue delay.

WHEREFORE, the Interested Parties object to the ASLRRA's motion, but do not oppose the AAR's motion.

Respectfully submitted,

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January 31, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of January 2011 the foregoing has been served upon the following persons via the means described below:

via electronic mail and first class mail to:

Louis P. Warchot Association of American Railroads 425 Third Street, SW Suite 1000 Washington, DC 20024

Keith T. Borman Vice President & General Counsel American Short Line and Regional Railroad Association Suite 7020 50 F Street, NW Washington, DC 20001

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